

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)	
)	Criminal No. 11-186-S-DLM
v.)	
)	
JOSEPH CARAMADRE)	
)	
and)	
)	
RAYMOUR RADHAKRISHNAN)	
)	
Defendants.)	

GOVERNMENT'S OPPOSITION TO DEFENDANT RADHAKRISHNAN'S
SECOND MOTION TO MODIFY CONDITIONS OF RELEASE

The United States of America, by and through its undersigned attorneys, hereby responds to Defendant Raymour Radhakrishnan's Second Motion to Modify Conditions of Release. For the reasons set forth herein, the Government recommends the Court deny Radhakrishnan's request to spend a January weekend in Las Vegas.

BACKGROUND

The grand jury returned an Indictment against the defendants on November 18, 2011. Summonses were issued, and the defendants were arraigned together on November 30, 2011. At the arraignment, defendant Radhakrishnan was released on unsecured bond, with conditions¹. Among other conditions, Radhakrishnan's travel was restricted to Rhode

¹The government requested a secured bond, arguing that Radhakrishnan's risk of flight will increase over time.

Island, Massachusetts (where he attends law school) and New Hampshire (where his parents reside). On December 21, 2011, the government agreed not to object to a modification of Radhakrishnan's travel to include Connecticut, where his longtime girlfriend resides. Having been given an inch, Radhakrishnan now seeks three thousand miles. Without consulting with the government, Radhakrishnan seeks to spend a weekend in Las Vegas in January "networking" for his "business," Network Display Systems.

ARGUMENT

Radhakrishnan has a long history of using Network Display Systems as a front to cover surreptitious conduct. Indeed, the Indictment alleges that in December 2007, Radhakrishnan and Caramadre purchased an \$800,000 annuity from Midland National Insurance Company in the name of Radhakrishnan and a terminally ill woman, Denise Egan. Caramadre used Radhakrishnan as a nominee to hide his interest in the annuity from Midland National. When Egan died, Midland National issued Radhakrishnan a check for \$883,774.72, which Radhakrishnan then funneled back to Caramadre. (See Count 65 of the Indictment, ¶¶181-189). In support of this fraudulent scheme, Radhakrishnan and Caramadre falsely claimed that Radhakrishnan was employed by Network Display Systems earning \$250,000 per year and that his net worth was greater than \$1,000,000. See **Exhibit A**, Attached. In truth, Radhakrishnan's sole employer was Caramadre, and Network Display Systems did no business, had no revenue and was merely a nominee shell, as is evident from the exhibit to his

own motion.

Radhakrishnan's Las Vegas trip is not some long planned, pre-existing business obligation. It is clear from his own exhibit that Radhakrishnan booked the flight to Las Vegas on December 5, 2011. That is less than a week after the government pointed out that if convicted, Radhakrishnan could spend as much as fifteen years in prison for his conduct, and less than a week after the Court confined his travel to Rhode Island, Massachusetts and New Hampshire.

CONCLUSION

If Radhakrishnan wishes to "network," he should do so within the conditions imposed by the Court. For the reasons set forth herein, the government objects to Radhakrishnan's Second Motion to Modify Conditions of Release.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, hereby certify that on this 22nd day of December, 2011, I caused the within Government's Opposition to Radhakrishnan's Second Motion to Modify Conditions of Release to be served via the Court's Electronic Filing System on:

For Joseph Caramadre:

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James T. McCormack, Esq.

For Raymour Radhakrishnan:

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